

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON**

UNITED STATES OF AMERICA

CASE NO. 3:15-CR-00148

Plaintiff,

JUDGE ROSE

vs.

CONNIE M. APOSTELOS

MOTION TO MODIFY BOND
ALLOWING LIMITED TRAVEL

Defendant.

Now comes the Defendant, **CONNIE M. APOSTELOS**, by and through her attorneys, **RION, RION & RION, L.P.A., INC.**, and hereby respectfully moves this Honorable Court for an Order modifying the conditions of bond allowing her to travel to her son's home located at 1340 Vista Ridge Drive, Miamisburg, Ohio 45342 on December 24, 2015 from 4:00 p.m. until 10:00 p.m. to celebrate the holiday and also her son's birthday. Defendant is willing to comply with any additional conditions that the Court may require.

Respectfully submitted,

/s/ Jon Paul Rion

JON PAUL RION (#0067020)
RION, RION & RION, L.P.A., INC.
Suite 2150
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Dayton, Ohio 45402 (937)
223-9133

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that a copy of the foregoing was sent to the office of the United States Attorney on the same day of filing.

//s// **Jon Paul Rion**

**JON PAUL RION
RION, RION & RION, L.P.A., INC.**